

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. <b>1:05cr414</b>
	)	
v.	)	
	)	
<b>MARIA ANTOINETTA MOURIZAKI,</b>	)	
<b>a/k/a: "Tonia,"</b>	)	
	)	
Defendant.	)	

**STATEMENT OF FACTS**

Were this case to go to trial, the government would prove beyond a reasonable doubt by competent and admissible evidence the following:

1. From in or about June 1997, to in or about April 2005, in Springfield, Virginia, in the Eastern District of Virginia and elsewhere, defendant **MARIA ANTOINETTA MOURIZAKI**, a/k/a: "Tonia" (hereinafter: Mourizaki) and Agni Lisa Brown, a/k/a: Agni Lisa Graham, "Michelle," & "Lisa" (hereinafter: Brown) and knowingly, willfully, and unlawfully combined, conspired, confederated and agreed together with each other to commit offenses against the United States of America, namely, to violate Title 18, United States Code, Sections 2421, and Section 2422(a) by knowingly transporting and causing to be transported individuals in interstate commerce with intent that such individuals engage in prostitution and by knowingly inducing and enticing individuals to travel in interstate commerce to engage in prostitution and illegal sexual activity.

2. During the period of the conspiracy, **MOURIZAKI** and Brown hired prostitutes from outside Virginia, assisted in their transportation to Virginia and housed some of them at the brothel located at 7623 Fullerton Road, Springfield, Virginia, which was open for business Monday through Saturday from approximately 9:00 a.m. until 10:00 p.m.

3. **MOURIZAKI** and Brown would charge customers set fees for the services of prostitutes which would be collected from the customers, and the prostitutes would collect "tips" from their customers, which they were allowed to keep. They kept records reflecting visits by customers to prostitutes, which included the names of the prostitutes and how long each customer spent with them.

4. In furtherance of the aforementioned conspiracy and to effect the objects thereof, at various times between February, 2004, to April 5, 2005, defendant **MOURIZAKI** oversaw operations of the brothel, to include admitting and greeting customers, answering the telephone and scheduling appointments and receiving and accounting for money from customers.

5. Defendant **MOURIZAKI's** actions as described above were done knowingly, willfully and unlawfully and not as a result of accident, mistake or other innocent reason.

Respectfully submitted,

Paul J. McNulty  
United States Attorney

By: Michael E. Rich/Erik R. Barnett  
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between me and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States could have proved the same beyond a reasonable doubt.

Maria Antoinetta Mourizaki  
Defendant

I am **MARIA ANTOINETTA MOURIZAKI's** attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

Kevin E. Smith